

REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested. Since this Amendment is being presented together with a Request for Continued Examination, entry of this Amendment is respectfully requested.

By this Amendment, claims 1, 6-12 and 15 are amended. Support for the amendments to claims 1, 6-12 and 15 may be found throughout the specification of the present application. No new matter is added. After entry of this Amendment, claims 1-16 will remain pending in the patent application.

Claims 1-3, 7, 11-12 and 16 were rejected under 35 U.S.C. §103(a) based on Henderson *et al.* (U.S. Pat. No. 6,404,869) (hereinafter "Henderson") in view of Martin *et al.* (U.S. Pat. No. 5,909,485) (hereinafter "Martin"). Claims 4-6, 8-10 and 13-15 were rejected under 35 U.S.C. §103(a) based on Henderson in view of Martin and further in view of Pierce *et al.* (U.S. Pat. No. 5,408,519) (hereinafter "Pierce"). Applicants respectfully traverse these rejections because Henderson, Martin and Pierce, taken alone or in combination, fail to disclose, teach or suggest all the features recited in the rejected claims.

For example, Henderson, Martin and Pierce, taken alone or in combination, fail to disclose, teach or suggest a method for customizing a prepaid service in a telecommunications system, the method comprising "maintaining subscriber information on at least one prepaid subscriber, defining at least two different prepaid profiles, each prepaid profile defining at least one attribute for the prepaid service, the attribute indicating how the prepaid service is to be provided; associating the prepaid subscriber's subscriber information with one of the at least two different prepaid profiles, and providing the prepaid service to the prepaid subscriber as indicated by the attribute defined in the one prepaid profile associated with the prepaid subscriber's information", as recited in claim 1 and its dependent claims.

Furthermore, Henderson, Martin and Pierce, taken alone or in combination, fail to disclose, teach or suggest a telecommunications system offering prepaid subscription services, the system comprising "at least one database having subscriber information on at least one prepaid subscriber, wherein the system is arranged to maintain at least two different prepaid profiles, each prepaid profile defining at least one attribute for the prepaid service, the attribute indicating how the prepaid service is to be provided; to associate the prepaid subscriber's subscriber information with one of the at least two different prepaid profiles; and

to provide a prepaid service to the prepaid subscriber as indicated by the attribute defined in the associated prepaid profile”, as recited in claim 7 and its dependent claims.

Likewise, Henderson, Martin and Pierce, taken alone or in combination, fail to disclose, teach or suggest a network element in a telecommunications system, where subscribers of the system can prepay for their calls by recharging their accounts via vouchers, the element including “a database or a connection to a database having subscriber information of prepaid subscribers, wherein the network element is arranged to have access to at least two different prepaid profile definitions, each prepaid profile defining at least one attribute for the prepaid service, the attribute indicating how the prepaid service is to be provided, and to update the subscriber information during recharge according to a prepaid profile associated with the recharging prepaid subscriber’s subscriber information, the associated prepaid profile being one of the at least two different prepaid profiles.”

Moreover, Henderson, Martin and Pierce, taken alone or in combination, fail to disclose, teach or suggest a network element in a telecommunications system, where subscribers of the system can prepay for their calls by recharging their accounts via vouchers, the element including “a database containing at least two different prepaid profile definitions, each prepaid profile defining at least one attribute for the prepaid service, the attribute indicating how a prepaid service is to be provided”, as recited in claim 12 and its dependent claims.

Henderson merely discloses a system including a data storage system for storing data corresponding to a prepaid telephone calling card and at least one location identifier related to the prepaid telephone calling card. (*See* col. 2, lines 15-20). The location identifiers are used to define what is charged from a telephone call service. *Id.* Henderson further discloses that a purchaser of a pre-paid card (“card purchaser”) selects and specifies at least one location identifier and then uses the pre-paid card to make telephone calls into a particular location (*e.g.*, country, etc.) and receives preferred, reduced service rates for such calls. (*See* col. 3, lines 46-51).

The Office Action argued, on page 3, lines 1-6, that the card usage data and location identifiers of Henderson each correspond to a different profile. Therefore, according to the Office Action, each subscriber’s subscriber information in Henderson is always associated with two different profiles because Henderson teaches that card usage data are associated with one location identifier to calculate the call charge. (*See* col. 5, lines 54-56 and col. 6, lines 44-47). However, such interpretation is contrary to the invention of claims 1-16, in

which the subscriber's subscriber information are associated with one of the at least two prepaid profiles.

Martin fails to remedy the deficiencies of Henderson because Martin merely discloses a method of prepaying for consumption of telephone calls. Martin discloses that at least three payment options are provided (*e.g.*, voucher, bank card or check). (*See* col. 5, line 1). However, unlike the invention of claims 1-16, Martin fails to disclose, teach or suggest that the prepaid subscriber's subscriber information are associated with one of the at least two different prepaid profiles. To the contrary, Martin discloses that the type of payment is selected each time a prepayment is made, thus teaching that the payment method information are not associated with the subscriber information. (*See* col. 5, lines 44-48). Accordingly, any reasonable combination of Henderson and Martin cannot result in any way in the invention of claims 1-16.

Furthermore, Applicants respectfully submit that one skilled in the art would not construe the location identifiers of Henderson or the different payment methods of Martin as constituting different profiles, because it would be apparent to one of ordinary skill in the art that a profile includes configuration settings. In addition, one skilled in the art would clearly understand that remaining minutes, unit billing rates, telephone service rates based on location and/or called numbers are not attributes defining how the prepaid service is to be provided, but merely define talk time.

Moreover, Martin clearly discloses that a prepaid subscriber may add money to his account using different payment methods, such as a voucher, a bank card or a check. These payment methods can be used with postpaid telephone services or when adding money to a bank account, for example. Thus, these different payment methods do not define profiles, and do not contain any attributes indicating how a (prepaid) service is to be provided.

Thus, Applicants respectfully submit that a reasonable combination of Martin and Henderson merely teaches using payment methods other than a prepaid card and that, irrespective of the payment method used, calls are billed based on telephone service rates that correspond to the user's pre-selected location identifier(s).

Pierce fails to remedy the deficiencies of Henderson and Martin because Pierce merely discloses a telecommunication system that keeps track of the cost of each call, including applicable taxes, in real time and notifies the user when the account balance approaches zero. (*See* col. 3, lines 4-6). However, Pierce fails to disclose, teach or suggest how the credit of the account is calculated when the account balance is restored.

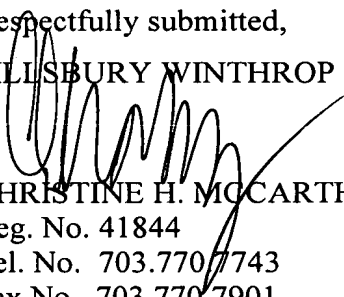
Moreover, unlike the invention of claims 4, 8 and 13, Pierce teaches restoring the balance to a specific sum, thus teaching that there is no need to calculate the credit during the recharge because the credit after a recharge is already set beforehand. In addition, unlike the invention of claims 5, 9 and 14, Pierce does not disclose, teach or suggest calculating the validity time of the prepaid credit. The fact that Pierce teaches limiting the number of times the prepaid account can be replenished during a week does not disclose a validity period of a prepaid account, since after the validity period expires, there is no prepaid account which could be replenished. Pierce merely teaches that when the time limit has passed, replenishing is again possible. (*See* col. 6, lines 8-13).

Furthermore, although Pierce teaches that replenishment is possible after a certain period of time, Pierce does not disclose what happens when the prepaid account is not replenished (recharged). Teaching that replenishing is limited in response to replenishment actually teaches that no limitations exist if the account is not replenished, which is contrary to claims 6, 10 and 15. Accordingly, all rejections having been addressed, Applicants request issuance of a notice of allowance indicating the allowability of all pending claims. If anything further is necessary to place the application in condition for allowance, Applicants request that the Examiner contact Applicant's undersigned representative at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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